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Attorneys for Defendant Cameron Collings

United States District Court

District of Nevada

United States of America,

Plaintiff,

V.

Cameron Collings,

Defendant,

Case No. 2:19-cr-00311-JCM-DJA

**Stipulation to Modify Conditions of Supervision
(First Request)**

(Expedited treatment requested)¹

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the United States and Richard A. Wright Esq., of Wright Marsh & Levy, and Robert Draskovich Esq., of Draskovich Law Group, counsel for the Defendant, Cameron Collings, that the conditions of his pretrial release be modified to allow for travel to the Central District of California from July 15-July 31, 2020.

¹ Due to the imminent travel dates requested, The Parties requests this Court review the Stipulation and proposed order expeditiously.

1 Neither the government nor United States Pretrial oppose this request.

2 This Stipulation is entered into for the following reasons:

3 1. The parties resolved this case preindictment. Thus, on January 2, 2020, a waiver of
4 indictment, arraignment and change of plea hearing were held. ECF 5, 7. At that time, Mr. Collings
5 pled guilty, by way of plea agreement, to one count receipt of child pornography in violation of 18
6 U.S.C. §§ 2252A(a)(2)(A) and (B)(1). ECF 3, 5, 7. A personal recognizance bond (PR bond) was
7 entered. ECF 9.

8 2. On June 26, 2020, Mr. Collings was sentenced to 87 months' imprisonment and the Court
9 ordered a self-surrender date of October 23, 2020. ECF 25, 26. The Judgment of Conviction was
10 entered on July 2, 2020. ECF 26.

11 3. Mr. Collings continues to remain under the supervision of United States Pretrial until he self-
12 surrenders.

13 4. Mr. Collings has been on pretrial release since January 2, 2020 with no significant violations.

14 5. The parties and Pretrial Services recommend modifying his current pretrial conditions to the
15 following:

- 16 • That Mr. Collings be allowed to travel from Las Vegas, Nevada to Huntington
17 Beach, California on July 15, 2020 and stay at his mother's residence from July 15-
18 July 31, 2020;
- 19 • That during this time, Mr. Collings be able to travel throughout the Central District
20 of California;
- 21 • That Mr. Collings provide his mother's contact information to Pretrial Services for
22 verification that her residence is appropriate and suitable for his temporary stay;
- 23 • That Pretrial Services place Mr. Collings on GPS monitoring and curfew at the
24 discretion of Pretrial Services during his travel dates of July 15-July 31, 2020. In
25 order to accommodate installation of the appropriate technology, that Mr. Collings
26 shall report to Pretrial Services shortly before and shortly after his travel days to
27 facilitate the GPS monitoring.

- 1 • That after the specified dates in this Order, Mr. Collings' normal curfew be re-
2 imposed, and he be removed from GPS monitoring and be placed on RF
3 monitoring.
4 • All other conditions of Pretrial Supervision remain in effect as well as any other
5 conditions previously imposed by this Court.

6 DATED July 13, 2020.
7

8 WRIGHT MARSH & LEVY

NICHOLAS A. TRUTANICH

9 United States Attorney

10 By: /s/ Richard A. Wright

11 Richard A. Wright
12 Robert Draskovich
13 Attorneys for Mr. Collings

14 By: /s/ Supriya Prasad

15 Supriya Prasad
16 Assistant United States Attorney

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**United States District Court
District of Nevada**

United States of America,

Plaintiff,

V.

Cameron Collings,

Defendant,

Case No. 2:19-cr-00311-JCM-DJA

[Proposed] Order Granting Modification of
Pretrial Release Conditions

Pursuant to the Stipulation of the Parties and for good cause appearing:

IT IS HEREBY ORDERED: that the conditions of Defendant Collings' pretrial release be modified as follows:

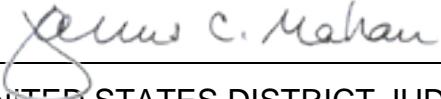
- That Mr. Collings be allowed to travel from Las Vegas, Nevada to Huntington Beach, California on July 15, 2020 and stay at his mother's residence from July 15-July 31, 2020;
 - That during this time, Mr. Collings be able to travel throughout the Central District of California;
 - That Mr. Collings provide his mother's contact information to Pretrial Services for verification that her residence is appropriate and suitable for his temporary stay;
 - That Pretrial Services place Mr. Collings on GPS monitoring and curfew at the discretion of Pretrial Services during Mr. Collings' dates of travel of July 15-July 31, 2020. In order to accommodate installation of the appropriate technology, that Mr. Collings shall report to Pretrial Services shortly before and shortly after his travel days to facilitate the GPS monitoring.
 - That after the specified dates in this Order, Mr. Collings' normal curfew be reimposed, and he be removed from GPS monitoring and be placed on RF monitoring.

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- 1 • All other conditions of Pretrial Supervision remain in effect as well as any other
2 conditions previously imposed by this Court.

3 IT IS SO ORDERED

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5 DATE: July 13, 2020

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UNITED STATES DISTRICT JUDGE